



SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY
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ANAHEIM • AZUSA • BANNING •
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PASADENA • RIVERSIDE • VERNON
IMPERIAL IRRIGATION DISTRICT

April 7, 2015

California Energy Commission
EPS Compliance
1516 Ninth Street
Sacramento, CA 95814-512
Attention: Compliance Filing

Re: EPS Compliance Filing for Don A. Campbell Phase 2 Geothermal Energy Project

Dear Sir or Madam:

Pursuant to 20 CCR § 2900 *et seq.*, of the California Code of Regulations, adopted by the California Energy Commission (CEC) to implement Senate Bill 1368, the Southern California Public Power Authority (SCPPA) hereby submits the attached compliance filing. In submitting this filing, SCPPA respectfully requests that the Commission determine that the procurements of geothermal renewable energy, associated environmental attributes and capacity rights pursuant to the power purchase agreement (PPA) between SCPPA and ORNI 37 LLC dated December 18, 2014 (the “Project”) is in compliance with the energy performance standard (EPS) regulations promulgated by the CEC.

SCPPA is a joint powers agency formed in 1980 pursuant to the Joint Exercise of Powers Act (Cal. Govt. Code § 6500 *et seq.*). SCPPA is comprised of eleven cities and one irrigation district (“Member”), each of which owns and operates an electric utility within its jurisdictional boundaries.

On December 18, 2014, the SCPPA Board of Directors, at a noticed public meeting consistent with the requirements of the Ralph M. Brown Act (“Brown Act,” Cal. Govt. Code § 54950 *et seq.*), approved and authorized execution and delivery of the PPA on behalf of the City of Los Angeles acting by and through its Department of Water and Power (“Participating Member”).

SCPPA executed the PPA on April 2, 2015 less than ten business days from the date of this compliance filing. The Participating Member will receive all of the geothermal renewable energy, associated environmental attributes and capacity rights acquired under the PPA through a Power Sales Agreement (“PSA”) between the Participating Member and SCPPA.

On December 11, 2014 SCPPA provided notice to the CEC of its intent to deliberate on a covered procurement, the Project, at its December 18, 2014 Board meeting consistent with 20 CCR § 2908.

This compliance filing is made on behalf of the Participating Member as well as for SCPPA's own account pursuant to the Commission's Emission Performance Standard ("EPS") regulations (20 CCR § 2900 *et seq.*).

Additional information about the Project is shown on Attachment A. Attachment B includes the Agenda Report presented to the SCPPA Board of Directors for its December 18, 2014, meeting (Attachment B-1) and the SCPPA Board Resolution No. 2014-139, adopted the same day (Attachment B-2). Attachment C is the attestation required by 20 CCR § 2909.

Sincerely,



Daniel S Hashimi
Assistant General Counsel

Attachments

Attachment A

CALIFORNIA ENERGY COMMISSION
EMISSION PERFORMANCE STANDARD COMPLIANCE FILING
DESCRIPTION OF DON A. CAMPBELL
PHASE I GEOTHERMAL ENERGY PROJECT

- Name of Facility: Don A. Campbell 2 Geothermal Energy Project
- Name of Counterparty: ORNI 37 LLC
- Location of Facility: 1132 Gabbs Valley Rd, Mineral County, NV 89420
- Technology/Fuel: Geothermal Electric Generating Facility
- Nameplate Capacity of Facility:
 - Total nominal gross nameplate capacity: 25 MW
 - Total nominal capacity net of Parasitic Load (under expected average site conditions): 16.2 MW
- Project Participant and Participation Share:
 - The City of Los Angeles Department of Water and Power – 16.2 MW
- Substitute Energy Allowed: No
- Contract Date: December 18, 2014
- Planned Commercial Operation Date: December 31, 2016
- Delivery End Date: December 30, 2036



ATTACHMENT B-1

SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY

Board of Directors Meeting

AGENDA ITEM STAFF REPORT

MEETING DATE: December 18, 2014

RESOLUTION NUMBER: 2014-139

CONSENT ☐

DISCUSSION ☒

RENEWAL ☐

NEW ☒

Place an X in box next to the appropriate consideration(s) above.

FROM: Finance <input type="checkbox"/> Energy Systems <input checked="" type="checkbox"/> Program Development <input type="checkbox"/> Regulatory/Legislative <input type="checkbox"/> Project Administration <input type="checkbox"/> Legal <input type="checkbox"/> <i>Place an X in box next to the appropriate consideration(s) above.</i>	METHOD OF SELECTION: Competitive <input checked="" type="checkbox"/> Cooperative Purchase <input type="checkbox"/> Sole Source <input type="checkbox"/> Single Source <input type="checkbox"/> Other <input type="checkbox"/> <i>If other, please describe:</i> <div style="border-bottom: 1px solid black; height: 20px; width: 100%;"></div>
Approved By Executive Director: <div style="border-bottom: 1px solid black; height: 40px; width: 100%; text-align: center;"></div>	

INITIAL MEMBER PARTICIPANTS:		
Anaheim <input type="checkbox"/>	Colton <input type="checkbox"/>	LADWP <input checked="" type="checkbox"/>
Azusa <input type="checkbox"/>	Cerritos <input type="checkbox"/>	Pasadena <input type="checkbox"/>
Banning <input type="checkbox"/>	Glendale <input type="checkbox"/>	Riverside <input type="checkbox"/>
Burbank <input type="checkbox"/>	IID <input type="checkbox"/>	Vernon <input type="checkbox"/>
<i>Place an X in box next to the applicable Member(s) shown above.</i>		

SUBJECT: Requesting authorization to enter into a power purchase agreement, a power sales agreement and an agency agreement for the Don A. Campbell 2 Geothermal Energy Project.

RECOMMENDATION: Approve authorization to execute and deliver the power purchase agreement, the power sales agreement, the agency agreement and issuance of a notice of exemption under Title 14 of the California Code of Regulations Section 15277.

BACKGROUND: The Authority entered into a power purchase agreement for Don A. Campbell 1 Geothermal Energy Project (formerly the Wild Rose Geothermal Energy Project) in December of 2012 to provide 16.2MW of long-term geothermal supply of renewable energy to LADWP and the City of Burbank Water and Power. In pursuit of the goals of the renewable development study project, the Authority has issued requests for proposals for potential renewable electric resources to address the Authority member renewable energy needs, and the LADWP in this project. Pursuant to that process the LADWP has identified the Don A. Campbell 2 Geothermal Energy Project as a viable geothermal power project which will further its renewable goals and



needs. The Authority and the LADWP have negotiated and developed, in substantial form, with ORNI 37 LLC a 16.2MW power purchase agreement to facilitate the purchase of geothermal energy and other rights and resources associated with the project. The Authority together with the LADWP has negotiated and developed a power sales agreement for the sale of all project energy and renewable attributes to the LADWP and an agency agreement through which the LADWP will serve as an agent on behalf of the Authority in the project.

FISCAL IMPACT: N/A

ATTACHMENT B-2

RESOLUTION NO. 2014 -139

RESOLUTION RELATING TO DON A. CAMPBELL 2 GEOTHERMAL ENERGY PROJECT AUTHORIZING THE DON A. CAMPBELL 2 PROJECT POWER PURCHASE AGREEMENT, THE DON A. CAMPBELL 2 GEOTHERMAL ENERGY PROJECT POWER SALES AGREEMENT, AND THE DON A. CAMPBELL 2 GEOTHERMAL PROJECT AGENCY AGREEMENT, AND AUTHORIZING THE EXECUTION AND DELIVERY OF EACH SUCH AGREEMENT, AND AUTHORIZING OFFICERS OF THE AUTHORITY TO DO OR CAUSE TO BE DONE ALL THINGS NECESSARY OR ADVISABLE TO CARRY OUT THE TRANSACTIONS CONTEMPLATED BY THIS RESOLUTION.

WHEREAS, the Southern California Public Power Authority (the "Authority") and its members have investigated the purchase of the generation and energy output of certain geothermal energy resources and facilities in order to provide a long term base load supply of renewable energy for its members;

WHEREAS, the Authority has approved pursuant to the Wild Rose Geothermal Energy Project Power Purchase Agreement the assignment and transfer by ORNI 47 LLC for purposes of the proposed Don A. Campbell 2 Geothermal Energy Project certain undivided interests of the Don A. Campbell 1 Geothermal Energy Project (formerly the Wild Rose Geothermal Energy Project) in accordance with certain Project Agreements the terms and provisions of which were also approved by the Authority;

WHEREAS, Officers of the Authority have negotiated the terms and conditions of a proposed Power Purchase Agreement with Ormat Nevada Inc. on behalf of ORNI 37 LLC for the purchase and delivery of the generation and energy output and related products, rights and benefits, including transmission and interconnection rights and entitlements of the Don A. Campbell 2 Geothermal Energy Project located in Nevada;

WHEREAS, the Project exist entirely in the State of Nevada, is subject to Nevada State laws as well as Federal laws and are subject to the requirements of the National Environmental Policies Act within the State of Nevada, which satisfy the requirements for the California statutory exemption under Title 14 California Code of Regulations Section 15277, and have undergone substantial review pursuant to these Nevada State laws and Federal laws;

WHEREAS, there is on file with the Authority the form of the proposed Don A. Campbell 2 Project Power Purchase Agreement, as negotiated by the Authority, for the purchase of the generation and energy output and related rights and entitlements for the benefit of the City of Los Angeles, acting by and through the Department of Water and Power ("LADWP"), as the Project participant;

WHEREAS, the Authority and LADWP desire to enter into a Power Sales Agreement, the form of which is on file with the Authority, pursuant to which the Authority will provide LADWP all products, rights and benefits obtained by the Authority with respect to the Don A. Campbell 2 Geothermal Energy Project, including the generation and energy output thereof, and LADWP agrees to pay the costs, liabilities and obligations of the Authority in connection with the Don A. Campbell 2 Geothermal Energy Project;

WHEREAS, the Authority and LADWP desire to enter into a Don A. Campbell 2 Geothermal Energy Project Agency Agreement, the form of which is on file with the Authority and pursuant to which LADWP will act as Project Manager and agent in connection with the management and administration of the Don A. Campbell 2 Geothermal Energy Project;

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Southern California Public Power Authority as follows:

1. The Board of Directors hereby delegates to the Executive Director of the Southern California Public Power Authority the authority to prepare, execute and issue a Notice of Statutory Exemption pursuant to Title 14 of the California Code of Regulations Section 15277 and to deliver and cause to be posted such Notice of Statutory Exemption in the appropriate locations and to carry forth such other actions as may be appropriate pursuant to Title 14 California Code of Regulations Section 15277.

2. The Don A. Campbell 2 Geothermal Energy Project Power Purchase Agreement between the Authority and ORNI 37 LLC is hereby authorized and the President or the Vice President of the Authority is hereby authorized and directed to execute and deliver such Power Purchase Agreement in substantially the form on file with the Authority with only such changes, insertions or omissions that shall be approved by the President or the Vice President, as evidenced by the President's or Vice President's execution and delivery of such Agreement, and the Secretary or any Assistant Secretary of the Authority is hereby authorized to attest to the execution of such Agreement.

3. The Don A. Campbell 2 Geothermal Energy Project Power Sales Agreement between the Authority and LADWP is hereby authorized and the President or the Vice President of the Authority is hereby authorized and directed to execute and deliver such Power Sales Agreement in substantially the form on file with the Authority with only such changes, insertions or omissions as shall be approved by the President or the Vice President, as evidenced by the

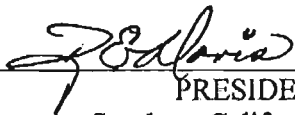
President's or the Vice President's execution and delivery of such Agreement, and the Secretary or any Assistant Secretary of the Authority is hereby authorized to attest the execution of such Agreement.

4. The Don A. Campbell 2 Geothermal Project Agency Agreement between the Authority and LADWP is hereby authorized and President and the Vice President of the Authority is hereby authorized and directed to execute and deliver such Project Agency Agreement in substantially the form on file with the Authority with only such changes, insertions or omissions as shall be approved by the President or the Vice President, as evidenced by the President's or the Vice President's execution and delivery of such Agreement, and the Secretary or any Assistant Secretary of the Authority is hereby authorized to attest to the execution of such Agreement.

5. Each of the President, the Vice President, the Secretary and any Assistant Secretary and any other officer of the Authority is hereby authorized to execute and deliver any and all other documents and instruments and to do and cause to be done any and all acts and things necessary or advisable for carrying out the transactions contemplated by this Resolution.

6. This Resolution shall become effective immediately.

THE FOREGOING RESOLUTION is approved and adopted by the Authority this 18th
day of December, 2014.



PRESIDENT
Southern California Public
Power Authority

ATTEST:



ASSISTANT SECRETARY
Southern California Public
Power Authority

CALIFORNIA ENERGY COMMISSION
EMISSION PERFORMANCE STANDARD COMPLIANCE FILING
COMPLIANCE FILING ATTESTATION

I, the official named below, certify under penalty of perjury, the following:

1. I am an agent of the Southern California Public Power Authority (SCPPA) authorized by its governing board to sign this attestation on its behalf. (Capitalized terms used herein have the meanings given in the cover letter submitted herewith.)
2. The SCPPA Board of Directors has reviewed and approved in public meetings both the covered procurement (on December 18, 2014) and the compliance filing described above (February 19, 2015).
3. Based on the SCPPA Board of Director's knowledge, information, and belief, the compliance filing does not contain a material misstatement or omission of fact;
4. Based on the SCPPA Board of Director's knowledge, information, or belief, the covered procurement complies with Title 20, Division 2, Chapter 11, Article 1 of the California Code of Regulations; and
5. The PPA contains the contractual terms or conditions specifying that the contract or commitment is void and all energy deliveries shall be terminated no later than the effective date of any Commission decision pursuant to 20 CCR § 2910 that the covered procurement fails to comply with 20 CCR § 2900 *et seq.*

Executed this 7th day of April, 2015, at Glendora, California.



Bill D. Carnahan, Executive Director
Southern California Public Power Authority

